

January 2, 2007

Ms. Jodi Winship
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: All America PAC
FEC ID No. C00344788

Dear Ms. Winship:

This is in response to your letter dated December 1, 2006 concerning the 12 Day Pre-General Report (10/1/06-10/18/06) of the All America PAC (the "Committee").

You ask about expenditures for "Catering," "Catering and Room Rental" and "Reimbursement-Catering." These expenditures were for the Committee's own operation and were not made on behalf of any specifically identified federal candidate.

You also asked about an expenditure for "Communications Consulting and Expenses." This expense was made to conduct the committee's own activities and did not contain express advocacy.

We hope that this information adequately addresses your question. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Robert Bauer
Counsel to All America PAC
